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ATTORNEY FOR DEBTOR

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

IN RE

CHERYL LYNN DECLOUET

Debtor

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§
§
§
§

CASE NO. 14-30153-HDH

CHAPTER 13

**MOTION TO REOPEN CHAPTER 13 CASE FOR PURPOSES OF FILING AN
ADVERSARY PROCEEDING CONCERNING A DISCHARGE VIOLATION**

TO THE HONORABLE JUDGE OF THIS COURT:

COMES NOW, **CHERYL LYNN DECLOUET**, (hereinafter, "Debtor"), requesting an order to reopen his Chapter 13 Case to allow him to file an Adversary Proceeding and would show the court the following:

1. Debtor filed a petition under Chapter 13 of Title 11 on January 6, 2014.
2. On or about, April 4, 2018, an Order of Discharge was entered in Debtor's case.
3. Debtor request the reopening of her case for the purpose of filing an Adversary Proceeding which will be filed once the Order Reopening the Case is entered by this Court.
4. The Adversary Proceeding has to do with Debtor's pre-petition account with a creditor who has continued to make collection attempts since the Order of Discharge and as such, a filing fee is not required pursuant to LBR 5010.

5. The Trustee is not needed for this matter to be reopened due to the nature of the adversary proceeding, which is to prosecute a discharge violation.

WHEREFORE, PREMISES CONSIDERED Debtor respectfully request the Court to Reopen Debtor's Chapter 13 Bankruptcy to allow him to pursue an adversary proceeding; and for such other relief the Court may grant.

Dated: November 6, 2019

Respectfully submitted,

HERRIN LAW, PLLC

/s/ C. Daniel Herrin

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that on November 13, 2019 a true and correct copy of the foregoing was served via electronic means as listed on the Court's ECF noticing system or by regular first class mail to the parties below and on the attached list.

CHAPTER 13 TRUSTEE

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Irving, TX 75062

US TRUSTEE

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DEBTOR:

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